

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**In Re: ANTHONY L. MOORE**

**CHAPTER 7  
NO: 20-13306 JDW**

**RESPONSE TO MOTION FOR RELIEF FROM STAY**

COMES NOW, ANTHONY L. MOORE, Debtor in the above styled and numbered cause, by and through undersigned counsel, and files this his Response to Motion for Relief from Stay, said Motion (Dkt. #10) having been filed by American Honda Finance Corp. ("Honda Finance"), respectfully showing unto the Court as follows:

1. The allegations of paragraph one of the Motion are admitted.
2. The allegations of paragraph two of the Motion are admitted.
3. The allegations of paragraph three of the Motion are admitted.
4. There was no proof attached to the Motion for Relief showing when or how Honda Finance perfected its lien.
5. The allegations of paragraph five of the Motion are admitted.
6. Debtor acknowledges that the amount is due, but he thought the loan had been paid off when he received the title to the Rancher. As a result, around that time Debtor sold the 2017 Honda Rancher when that title was received, which was in excess of 2 years ago.
7. The allegations of paragraph seven of the Motion are admitted.
8. The allegations of paragraph eight of the Motion are denied.

9. The allegations of paragraph nine of the Motion are denied.

10. The allegations of paragraph ten of the Motion are denied.

WHEREFORE, Debtor prays this Court will enter its Order denying the Motion for Relief from Stay filed by Honda Finance and dismissing the same. Debtor prays for such other, further and general relief to which he may be entitled.

Respectfully Submitted,  
ANTHONY L. MOORE, Debtor

By: /s/ Robert Gambrell  
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CERTIFICATE OF SERVICE

I, ROBERT GAMBRELL, Attorney for the above listed Debtor, do hereby certify that the following have been served electronically via ECF the above Response to Motion for Relief from Stay:

David W. Asbach, Acting U. S. Trustee  
William L. Fava, Chapter 7 Trustee  
Kent D. McPhail, Attorney for American Honda Finance Corp.

Served on this the 2<sup>nd</sup> day of January, 2021.

/s/ Robert Gambrell  
ROBERT GAMBRELL